

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

IN RE: COLGATE-PALMOLIVE)	
SOFTSOAP ANTIBACTERIAL HAND)	MDL Docket No. 12-md-2320-PB
SOAP MARKETING AND SALES)	
PRACTICES LITIGATION)	All Actions
(MDL NO. 2320))	
_____)	

JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Federal Rule of Civil Procedure 23 and Local Rule 23.1 and this Court's Preliminary Approval Order dated June 5, 2015 (Dkt. No. 93) (the "Preliminary Approval Order"), plaintiffs Tracy Nieblas, Shari Elstein, Kristina Pearson, Adam Emery and Jeff Dyke, in their individual capacities and as class representatives ("Plaintiffs"), and Defendant Colgate-Palmolive Company ("Defendant") (collectively, the "Parties"), by and through their respective counsel, file this Joint Motion for Final Approval of Class Action Settlement (the "Joint Motion") and incorporate by reference their Joint Memorandum of Law in Support of Joint Motion for Final Approval of Class Action Settlement which is filed herewith.

The Parties respectfully request that the Court enter an Order:

- (1) certifying a Settlement Class pursuant to Fed. R. Civ. P. 23(b)(2), as defined in the proposed Settlement Agreement and Release for settlement purposes only (the "Class");
- (2) granting final approval of the proposed settlement of this class action on the terms set forth in the Settlement Agreement; and
- (3) granting such further relief as this Court deems just and proper.

Respectfully submitted,

Dated: August 28, 2015

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Dated: August 28, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 28, 2015, she caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to registered counsel of record for each party.

/s/ Lucy J. Karl
Lucy J. Karl (NH Bar # 5547)